POCKET SECTION BEFORE SECTION POSTAL RATE COMMISSION WASHINGTON, D.C. 20268-0001

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Docket Non R9701

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FOLLOW-UP INTERROGATORIES OF AMERICAN BUSINESS PRESS TO USPS WITNESS JOE ALEXANDROVICH (USPS-T5-1-2)

Pursuant to Sections 25 and 26 of the Commission's Rules of Practice, the American Business Press hereby submits the attached interrogatories to USPS Witness Alexandrovich (ABP/USPS-T5). If the designated witness is unable to respond to any interrogatory, we request a response by some other qualified witness.

Respectfully submitted,

David R. Straus, Esq. Stephen M. Feldman, Esq. THOMPSON COBURN

700 14th Street, N.W., Suite 900

Washington, D.C. 20005

Counsel for the American Business Press

October 8, 1997

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing documents in accordance with Section 12 of the Commission's Rules of Practice.

Stephen M. Feldman

Dated: October 8, 1997

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FOLLOW-UP INTERROGATORIES OF AMERICAN BUSINESS PRESS (ABP) TO USPS WITNESS JOE ALEXANDROVICH (USPS-T5)

ABP/USPS-T5-1

In your response to ABP/USPS-T13-13(a) (redirected from Witness Bradley) you state that both volume and non-volume variable costs would decline if dropshipping "caused the accrued costs in certain purchased highway transportation accounts to decline".

- [a] Which accounts in particular do you have in mind and provide examples where non-volume variable costs have declined because of dropshipping;
- [b] if a cost does not vary with volume, or with the transportation of a unit of volume, then how and why can a "non-variable" cost decline because of less volume?

ABP/USPS-T5-2

ABP/USPS-T13-13, to which you responded, asked what was "the primary reason" that 26% of total highway costs are non-attributable, as compared with higher variability/attributions for other transportation mode accounts. You replied that there are different variabilities for different modes because "terms of incurrence in purchased highway transportation result in these costs being less sensitive to volume changes.". Explain in detail what you mean by "terms of incurrence".

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